

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES)
) No. 03-CR-10385-RGS
V.)
)
KIRK RINALDI)
_____)

MOTION FOR DISCLOSURE OF SEALED AND PROBATION DOCUMENTS

Now comes the Defendant in the above entitled matter and moves this honorable Court to disclose to his new assigned counsel and documents filed by predecessor counsel that are under seal. In addition, Counsel requests that the Court order the Probation department to provide counsel with a copy of his Probationary record along with any pre interview PSI or PSR that has been prepared.

As grounds therefore Counsel needs to review this documents with his client in order to adequately prepare the defense in this case and the possibility of resolving the matter short of trial.

KIRK RINALDI
BY HIS ATTORNEY

/s/ "Eduardo Masferrer" _____
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